

The Honorable _____

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

BRIAN A. GLASSER, AS TRUSTEE OF THE
YELLOWSTONE CLUB LIQUIDATING
TRUST

Plaintiff,

v.

JESSICA T. BLIXSETH and JTB, LLC,

Defendants.

No. _____

**[PROPOSED] TEMPORARY
RESTRAINING ORDER**

Upon consideration of the Motion of Plaintiff Brian A. Glasser, as Trustee of the Yellowstone Liquidating Trust (the "Trust"), for a temporary restraining order barring the Defendants and others from transferring the property that is the subject of this action and the Verified Complaint in this action; and it appearing that the provision of immediate injunctive relief is authorized under applicable law and necessary and appropriate to prevent the Defendants, Timothy L. Blixseth, and their agents and other representatives from disposing of the property and assets that are the subject of this action before the Court can consider entry of a preliminary injunction in order to preserve this Court's ability to afford effective relief and prevent irreparable injury to the Plaintiff, it is

ORDERED that Jessica T. Blixseth, JTB, LLC, Timothy L. Blixseth, and any of their agents, servants, employees, independent contractors, attorneys, representatives, affiliates, and those persons

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1 or entities in active concert or participation with them be, and they hereby are, enjoined from directly
2 or indirectly (a) transferring, concealing, disposing of, assigning, hypothecating, encumbering, or
3 otherwise dissipating the membership interests in, or any remaining assets of, Western Air & Water,
4 LLC, by whomsoever held, including, without limitation, the yacht known as "The Piano Bar," and
5 any and all proceeds, products, offspring, rents, or profits of such membership interests or assets (the
6 "Subject Assets"), (b) merging, consolidating, reorganizing, dissolving, liquidating, or changing in
7 any way the structure or ownership of Western Air & Water, LLC, or (c) causing any entity owned or
8 controlled by or affiliated with any of them, including any corporation, limited liability company,
9 limited partnership, or trust, to transfer, conceal, dispose of, assign, hypothecate, encumber, or
10 otherwise dissipate the Subject Assets or merge, consolidate, reorganize, dissolve, liquidate, or
11 change in any way the structure or ownership of Western Air & Water, LLC, pending further order of
12 this Court;

13 ORDERED that Defendants Jessica T. Blixseth and JTB, LLC shall, within ten days after
14 service of this Order upon them, produce to the Plaintiff an itemized list of the Subject Assets and
15 complete and unredacted copies of any and all documents evidencing the present ownership of the
16 Subject Assets, including any and all documents evidencing their acquisition of the Subject Assets
17 and current title or other recorded documents evidencing the ownership of "The Piano Bar" yacht;

18 ORDERED that this temporary restraining order shall expire at midnight on the date that is
19 fourteen days from the date hereof, unless further extended by the Court within such fourteen day
20 period.

21 Dated this _____ day of October 2014 at ____:____.m.

22
23 _____
24 UNITED STATES DISTRICT JUDGE

25
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